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April 13, 2011  
(PBW Project No. 1649)

VIA FEDERAL EXPRESS

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-RA)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Ms. Rita Engblom, On-Scene Coordinator  
U.S. Environmental Protection Agency, Region 6  
Superfund Division (6SF-AP)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: March 2011 Monthly Report for UAO and March 2011 Monthly Report for Settlement Agreement, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller and Ms. Engblom:

Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) and Section VIII, Paragraph 41.a of the Administrative Settlement Agreement and Order on Consent for Removal Action (Settlement Agreement) for the above-referenced Site. Parker Drilling Offshore Corporation is participating in the Site work under an agreement it reached with the above Respondents. As discussed in my telephone conversation with Mr. Miller on August 2, 2005, regarding the UAO, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. The Settlement Agreement requires submittal of a progress report by the 15<sup>th</sup> of every month.

In accordance with the UAO requirements for the Remedial Investigation/Feasibility Study (RI/FS) this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the Remedial Investigation/Feasibility Study (RI/FS) Work Plan, including preparation and shipment of the Final BERA Report to EPA on March 31, 2011;



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- RI Report activities (SOW Paragraph 39) detailed under Task 9 of the RI/FS Work Plan, including preparation of the Final RI Report that was submitted to EPA by letter dated April 6, 2011; and
  - FS activities (SOW Paragraph 44) detailed under Task 10 of the RI/FS Work Plan, including preparation and shipment of the Final RAM to EPA on March 10, 2011, and partial preparation of the Draft FS Report.
2. Results of RI/FS sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No new analytical data were received during the previous month.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of RI/FS work – The following actions are planned for the next two months:
- Submittal of replacement pages for the Final BERA Report (based on EPA's approval with modifications of the Final BERA Report received on April 7, 2011); and
  - Preparation and submittal of the Draft FS Report.

SOW Paragraph 42 requires that the Respondents conduct a presentation to the EPA within 15 calendar days following submission of the Final RI Report. In an April 7, 2011 e-mail to Mr. Miller I asked whether such a presentation was still desired in light of the numerous recent discussions between the Respondents and EPA regarding the RI data and alternatives for Site remediation. The Respondents are currently awaiting a response to this inquiry. Depending on the response, such a presentation may take place within the next two months.

4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 95% complete.

In accordance with the Settlement Agreement requirements, this report also addresses the topics listed below for the Removal Action:

1. Significant Removal Action developments during the preceding period, including actions performed and any problems encountered – The following actions were taken during the previous month:
- Off-site disposal of excavated soils; and
  - Preparation and shipment of the Final Removal Action Report to EPA on March 23, 2011.
2. Removal Action analytical data received during the reporting period – No new analytical data were received during the reporting period.
3. Removal Action developments anticipated during next reporting period, including a schedule of actions to be performed, anticipated problems, and planned resolutions of past or anticipated problems – The only remaining Removal Action activities are the

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preparation and submittal of a Removal Action Report Addendum following receipt of all outstanding disposal manifests from the Removal Action contractor. It is anticipated that this addendum will be submitted during the next reporting period.

Thank you for the opportunity to submit this monthly report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Ray Merrell – Sequa Corporation  
Mr. John Eldridge – Haynes and Boone, LLP  
Mr. Donnie Belote - The Dow Chemical Company  
Mr. Ed Menger – Parker Drilling Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP  
Mr. Jay Winters – Golder Associates, Inc.